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 Attorneys for Defendants

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 NAVAJO HEALTH FOUNDATION – SAGE  
 14 MEMORIAL HOSPITAL, INC. (doing business  
 as “Sage Memorial Hospital”); an Arizona non-  
 15 profit corporation

16 Plaintiff,

17 v.

18 RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 19 business as “Razaghi Healthcare”), et al.,

20 Defendants.  
 21

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
 EXTEND TIME FOR  
 DEFENDANTS TO FILE REPLY  
 IN SUPPORT OF DEFENDANTS’  
 MOTION TO DISMISS SECOND  
 AMENDED COMPLAINT**

**(FIRST REQUEST)**

22 IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi  
 23 Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively,  
 24 “Defendants”) shall have an extension of time, up to and including January 21, 2022, to

1 submit Defendants' reply in support of their Motion to Dismiss Second Amended Complaint  
2 (ECF No. 147) therein addressing the arguments raised in Plaintiff's Opposition to  
3 Defendants' Second Motion to Dismiss (ECF No. 164).

4       The parties have so stipulated to this extension request due to defense counsel's  
5 concurrent case obligations well as the recent and upcoming holidays. Since the filing of  
6 Plaintiff's Opposition to Defendants' Second Motion to Dismiss (ECF No. 164) on  
7 November 9, 2021, defense counsel has participated in an oral argument before the Ninth  
8 Circuit Court of Appeals, extensive and successful settlement negotiations on a collective  
9 action matter, and in preparing an opening brief in a subsequent Ninth Circuit Court of  
10 Appeals matter. Defendants now seek the instant extension through January 21, 2022 due  
11 to defense counsels' upcoming case obligations including a preplanned City Council  
12 presentation regarding the collective action matter, a pre-scheduled settlement conference  
13 in an unrelated case, and the upcoming winter holidays. The additional time requested herein  
14 will permit counsel for Defendants to meet other case commitments while addressing the  
15 arguments raised in Plaintiff's Opposition to Defendants' Second Motion to Dismiss (ECF  
16 No. 164).

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The parties agree that good cause exists to support this request for Defendants to have additional time, up to and including January 21, 2022, to submit their reply in support of their Motion to Dismiss Second Amended Complaint. This is the first request to extend this deadline.

RESPECTFULLY SUBMITTED this 8th day of December 2021.

JENNER & BLOCK LLP

FISHER & PHILLIPS LLP

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**IT IS SO ORDERED *nunc pro tunc*.**

Dated this 13 day of December, 2021

  
 Gloria M. Navarro, District Judge  
 UNITED STATES DISTRICT COURT

FISHER & PHILLIPS LLP  
 3200 N. Central Avenue, Suite 1550  
 Phoenix, Arizona 85012-2487  
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**CERTIFICATE OF SERVICE**

This is to certify that on December 8, 2021, the undersigned, an employee of Fisher & Phillips LLP, electronically filed the Joint Stipulation to Extend Time for Defendants to File Reply in Support of Defendants' Motion to Dismiss Second Amended Complaint with the U.S. District Court, and a copy was electronically transmitted from the Court to the e-mail address on file for:

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